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04/30/2003 01:04 PM

To: stephen.h.korzeniowski@usa.dupont.com
cc: (bcc: Mary Dominiak/DC/USEPA/US)
Subject: Follow-up Questions Regarding TRP LOI Commitments

In the TRP Letter of Intent dated March 14, 2003 there are commitments to a variety of environmental fate, incineration and product testing activities. We would like to understand precisely what work is being undertaken and would appreciate some clarification about some of the LOI items. After we understand the specifics of the LOI commitments, we will be in a better position to identify testing issues that are adequately dealt with in the LOIs vs. items that may need to be addressed in the ECA discussions commencing on June 6.

To that end, could you please provide a detailed description of the various testing activities that are described in the LOI? In particular, EPA requests clarification on the following items:

LOI page 3
item 1. Product and Article Analysis

- How will representative products and articles be selected? What criteria will determine which products and articles are "representative"?
- Will the number of products and articles analyzed be sufficient to make a judgement about the overall contribution of telomer products and articles to PFOA in the environment?
- What are the chemical identities of the products?
- We have received test methods from TRP for both products (chemicals) and articles -- Has either method ever been used before?
- Can you update us on the validation status and accuracy and precision of each test method?
- Will PFOA precursors such as free telomer alcohols be analyzed for in addition to PFOA? If so, which ones?
- Do you have a consolidated written description of the procedures that will be followed with this testing? If so, please provide a copy. If these procedures have already been identified in a submission to the Agency (ie. to AR226 or 8(e)), please identify the submission.
- What is the timing of this work?

LOI page 3
item 2 Aged Products and In Use Articles

- How many products and articles will be analyzed?
- How will representative products and articles be selected?
- Will the number of products and articles analyzed be sufficient to make a judgement about the overall contribution of telomer products and articles to PFOA in the environment through this pathway?
- What are the chemical identities of the products?
- How will products and articles be "aged"?
- What test method will be used to analyze the samples? (Will it be the same test method as in item 1?)
- What is the test method's validation status and its accuracy and precision?
- Will PFOA precursors such as free telomer alcohols be analyzed for in addition to PFOA? If so, which ones?
- Do you have a consolidated written description of the procedures that will be followed with this testing? If so, please provide a copy. If these procedures have already been identified in a submission to the Agency (ie. to AR226 or 8(e)), please identify the submission.
- What is the timing of this work?

LOI page 4
Releases of PFOA from Telomer Treated Article Manufacture

- How many samples will be analyzed?
- How will representative articles be selected?
- Will the number of articles analyzed be sufficient to make a judgement about the overall contribution of telomer treated articles to PFOA in the environment?
- What test method will be used to analyze the samples? (will it be the same test method as in item 1?)

- What is the accuracy and precision of the test method?
- Will PFOA precursors such as free telomer alcohols be analyzed for in addition to PFOA? If so, which ones?
- Do you have a consolidated written description of the procedures that will be followed with this testing? If so, please provide a copy. If these procedures have already been identified in a submission to the Agency (ie. to AR226 or 8(e)), please identify the submission.
- What is the timing of this work?

LOI page 5
Biodegradation Analysis

- How many products will be studied and how will they be selected ?
- What are the chemical identities of the products
- What test method will be used?
- What is the accuracy and precision of the test method?
- Will PFOA precursors such as free telomer alcohols be analyzed for in addition to PFOA? If so, which ones?
- Do you have a consolidated written description of the procedures that will be followed with this testing? If so, please provide a copy. If these procedures have already been identified in a submission to the Agency (ie. to AR226 or 8(e)), please identify the submission.
- What is the timing of this work?

LOI page 5
Incineration Analysis

- How many products and articles will be analyzed?
- How will representative products and articles be selected?
- What are the chemical identities of the products?
- What test method will be used to analyze the samples?
- Has the test method ever been validated?
- What is the accuracy and precision of the test method?
- Will PFOA precursors such as free telomer alcohols be analyzed for in addition to PFOA? If so, which ones?
- Do you have a consolidated written description of the procedures that will be followed with this testing? If so, please provide a copy. If these procedures have already been identified in a submission to the Agency (ie. to AR226 or 8(e)), please identify the submission.
- What is the timing of this work?

We would appreciate a response by May 5, 2003. Please call me at 202 564 -8171 if you have any questions or need to discuss further. Thanks for your continued help on these matters.